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Attorneys for Plaintiff, Wells Fargo Bank, National Association, as Trustee for Morgan Stanley Capital I Inc. Trust 2006-HE1, Mortgage Pass-Through Certificates, Series 2006-HE1

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 WELLS FARGO BANK, NATIONAL
13 ASSOCIATION, AS TRUSTEE FOR
14 MORGAN STANLEY CAPITAL I INC.
15 TRUST 2006-HE1, MORTGAGE PASS-
16 THROUGH CERTIFICATES, SERIES 2006-
17 HE1,

18 Plaintiff,

19 vs.

20 WESTCOR LAND TITLE INSURANCE
21 COMPANY; DOE INDIVIDUALS I through
22 X; and ROE CORPORATIONS XI through
23 XX, inclusive,

24 Defendants.

Case No.: 2:21-cv-00326-JCM-BNW

**STIPULATION AND ORDER TO
EXTEND TIME PERIOD TO RESPOND
TO MOTION TO DISMISS [ECF No. 6]**

[Second Request]

25 Plaintiff, Wells Fargo Bank, National Association, as Trustee for Morgan Stanley
26 Capital I Inc. Trust 2006-HE1, Mortgage Pass-Through Certificates, Series 2006-HE1 (“Wells
27 Fargo”) and Defendant Westcor Land Title Insurance Company (“Westcor”), by and through
28 their counsel of record, hereby stipulate and agree as follows:

1. On January 22, 2021, Wells Fargo filed its Complaint in Eighth Judicial District Court, Case No. A-21-828236-C [ECF No. 1-1];
2. On February 26, 2021, Westcor filed its Petition for Removal to this Court [ECF No. 1];

- 1 3. On March 5, 2021, Westcor filed a Motion to Dismiss [ECF No. 6];
2 4. Wells Fargo's deadline to respond to Westcor's Motion to Dismiss is currently April
3 19, 2021 [ECF No. 9];
4 5. Wells Fargo's counsel is requesting a brief, one-week extension until April 26, 2021,
5 to file its response to the pending Motion to Dismiss;
6 6. This extension is requested to allow Wells Fargo additional time to finalize and file
7 its response to the pending Motions to Dismiss.
8 7. Counsel for Westcor does not oppose the requested extension;
9 8. This is the second request for an extension which is made in good faith and not for
10 purposes of delay.

11 **IT IS SO STIPULATED.**

12 DATED this 16th day of April, 2021.

DATED this 16th day of April, 2021.

13 WRIGHT, FINLAY & ZAK, LLP

MAURICE WOOD

14 /s/ Lindsay D. Robbins

/s/ Brittany Wood

15 Lindsay D. Robbins, Esq.

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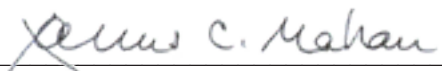
Las Vegas, Nevada 89134

19 *Attorneys for Plaintiff, Wells Fargo Bank,*
20 *National Association, as Trustee for Morgan*
Stanley Capital I Inc. Trust 2006-HE1,
Mortgage Pass-Through Certificates, Series
2006-HE1

Attorney for Defendant, Westcor Land Title
Insurance Company

21 **IT IS SO ORDERED.**

22 Dated April 19, 2021.

23 
24 UNITED STATES DISTRICT COURT JUDGE